The Vitamin Shoppe

VITAMIN SHOPPE INDUSTRIES INC.

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August 27, 1999

Elizabeth A. Yetley, Ph.D. Director
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street S.W.
Washington D.C. 20204

Re: FDCA 403(r)(6) Notification

Dear Dr. Yetley:

Pursuant to section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (FDCA), 21 U.S.C. 343(r)(6), and implementing Food and Drug Administration regulation, 21 C.F.R. 10 1.93 (62 Fed. Reg.49886 (Sept 23, 1997)), the Vitamin Shoppe Inc. submits this notification that statements are included in labeling its dietary supplements, as attached.

The Vitamin Shoppe Inc. at 4700 **Westside** Avenue, North Bergen, New Jersey is the distributor of the dietary supplements.

The undersigned certifies that the information contained in this notice is complete and accurate, and that the notifying firm has substantiation that each statement is **truthful** and not misleading.

Respectfully yours,

Patti Ann Kelly, Ph.D.

Director of Scientific and Regulatory Affairs

The Vitamin Shoppe Inc.

LET 4208

Product Names	<u>VS #</u>	<u>Inaredients</u>	Structure/Function Statements
Super Stress Formula	1050, 1051	Vitamin C (as ascorbic acid)	1) Vitamin C supports the immune system when under stress.
		Thiamin, Vitamin B6 (as pyridoxine HCI), Vitamin B12 (as cyanocobalamin)	1) Thiamin, vitamin B6 and B12 can support the immune system when under stress.
		Vitamin B12 (as cyanocobalamin)	 Vitamin B12 is essential for function of the nervous system. Vitamin B12 supports nervous system function, especially with aging.
		Vitamin B6 (as pyridoxine HCI)	1) Vitamin B6 is essential for nervous system function.
St. John's Wort for Woman's Monthly Needs	1588	Vitamin B6 (as pyridoxine HCI)	1) Vitamin B6 supports a sense of well-being when under stress.
		St. John's Wort (<i>Hypericum perforatum</i>)(flowers) standardized to 0.3% hypericin	 St. John's Wot-t promotes a sense of well-being. St. John's Wort promotes positive mood.
		Siberian Ginseng (<i>Eleutherococcus senticosus</i>) (root) standardized to 8% eleutherosides	1) Siberian ginseng supports the body's energy levels.
		Korean Ginseng (<i>Panax ginseng</i>)(root) standardized to 15% ginsenosides	1) Korean ginseng supports the body's energy levels.
Brute Strength	1229	Magnesium (as citrate)	1) Magnesium can aid a strength training program.
		L-carnitine	 L-Carnitine plays a role in aerobic processes. L-Carnitine may help performance in athletic training.
		Siberian ginseng (Eleutherococcus senticosus)	1) Siberian ginseng supports the body's energy levels.

Product Names	<u>VS #</u>	<u>Inaredients</u>	Structure/Function Statements
Colon Enhancer	1187, 1188	Psyllium (<i>Plantago asiatica</i>) (seed husks)	 Psyllium seed husks help healthy colon movement. Psyllium seed husks support healthy colon regularity.
		Cascara sagrada (Rhamnus purshiana)(bark)	 Cascara sagrada helps healthy colon movement. Cascara sagrada supports healthy colon regularity
Opti-Vue with Lutein Nutritional Support for	2128, 2129	Vitamin A (as palmitate)	1) Vitamin A supports eye health.
Your Eyes		Vitamin A (as beta-carotene)	1) Beta-carotene can be converted to vitamin A in the Body. Vitamin A supports eye health.
		Vitamin A (as palmitate), Vitamin A (as beta-carotene) Vitamin E (as d-alpha-tocopherol) Vitamin C (as ascorbic acid) Zinc (as picolinate) Selenium (as selenomethionine)	1) A combination of vitamin A, beta carotene, vitamin E, C, zinc, and selenium can support eye health.
		Lutein (from marigold flower) Zeaxanthin (from marigold flower)	 Lutein and zeaxanthin support eye health during aging. Lutein and zeaxanthin support eye health.
The Fat Transporter	1111, 1112	Choline (as choline bitartrate)	1) Choline is involved in the absorption and transport of
		Inositol	fat. 1) Inositol plays a role in fat metabolism.
		Taurine	 Taurine supports healthy cholesterol metabolism. Taurine can be converted to taurocholic acid, which plalys a role in healthy cholesterol metabolism. Taurine can be converted to taurocholic acid, which is involved in the absorption and transport of fat.
Woman Life Changes	1402	Black cohosh (Cimicifuga racemosa)(root)	 Black Cohosh promotes a sense of well-being during a woman's life change. Black cohosh supports a woman during her life change. Black cohosh promotes a sense of calm during a woman's life change.
		Chasteberry (Vitex agnus-castus)(berry)	1) Chasteberry promotes a feeling of well-being during a woman's life transition.
Woman Monthly Cycle	1403	Vitamin B6 (as pyridoxine HCI)	1) Vitamin B6 supports a sense of well-being.
		Evening primrose oil (Oenothera biennis)(seed)	1) Evening primrose oil supports a sense of well-being.

Product Names	<u>VS #</u>	<u>Ingredients</u>	Structure/Function Statements
Herbal Regularity	1493	Cascara sagrada (Rhamnus purshiana)(bark)	 Cascara sagrada helps healthy regularity. Cascara sagrada promotes normal regularity.
		Senna (Cassia angustifolia)(leaves)	 Senna helps healthy regularity. Senna promotes normal regularity.
Woman Herbal Regularity	1398	Cascara sagrada (Rhamnus purshiana)(bark)	 Cascara sagrada helps healthy regularity. Cascara sagrada promotes normal regularity.
		Senna (Cassia angustifolia)(leaves)	 Senna helps healthy regularity. Senna promotes normal regularity.
Antioxidant Cocktail II	1580	Pine bark extract	1) Pine bark extract contains procyanidins, which are antioxidants that protect against free radicals.
		Co-Enzyme Q10 (ubiquinone)	1) Co-enzyme Q10 is an antioxidant that protects against free radicals.
		Alpha lipoic acid	1) Alpha lipoic acid is an antioxidant that protects against free radicals.
		Green tea (<i>Camillia sinensis</i>)(leaves) standardized to contain 75% polyphenol catechins	1) Polyphenol catechins are antioxidants that protect against free radicals.
		Grape seed (Vitis vinifera)(seed)	1) Grape seed contains proanthocyanidins which are antioxidants that protect against free radicals.
Estra Prime	1477	Soy concentrate	1) Soy contains isoflavones which promote a sense of well-being during a woman's life change.
		Korean ginseng (<i>Panax ginseng</i>)(root) standardized to contain 7% ginsenosides	1) Korean Ginseng supports the body's energy levels.

Product Names	<u>VS #</u>	<u>Inaredients</u>	Structure/Function Statements
Protector Caps	1274	Vitamin A (as beta-carotene)	 Beta-carotene guards against damaging oxidants. Beta-carotene is a potent lipid-soluble antioxidant. Beta-carotene is an antioxidant that protects against free radicals.
		Vitamin E (as d-alpha-tocopheryl succinate)	 Vitamin E promotes cardiovascular health. Vitamin E protects the body against free radicals. Vitamin E protects cell membranes from free radicals. Vitamin E is a major lipid soluble antioxidant.
		Vitamin C (as calcium ascorbate. threonate)	 Vitamin C is an antioxidant that protects against free radicals. Vitamin C helps to prolong the antioxidant activity of vitamin E.
		Selenium (as selenomethionine)	 Selenium is an essential trace mineral that supports the function of antioxidant enzymes. Selenium supports the antioxidant activity of vitamin E.
		N-Acetyl cysteine	1) N-Acetyl cysteine is an antioxidant that protects against free radicals.
		Pine bark extract	1) Pine bark extract contains procyanidins, which are antioxidants that protect against free radicals.
		Co-enzyme Q10 (ubiquinone)	1) Co-enzyme Q10 is an antioxidant that protects against free radicals.
		Green tea (Camellia sinensis)(leaves) standardized to 40% polyphenols	1) Polyphenol catechins are antioxidants that protect against free radicals.
Nutritional Support for Weight Management	2145	Chromium (as picolinate)	 Chromium plays a role in glucose utilization. Chromium supports normal glucose utilization.

Product Names	<u>VS</u> #	<u>Inaredients</u>	Structure/Function Statements
Super Anti-oxidant	1176	Vitamin A (beta-carotene)	 Beta-carotene guards against damaging oxidants. Beta-carotene is a potent lipid-soluble antioxidant. Beta-carotene is an antioxidant that protects against free radicals.
		Vitamin C (calcium ascorbate)	 Vitamin C is an antioxidant that protects against free radicals. Vitamin C helps to prolong the antioxidant activity of vitamin E.
		Vitamin E (as dalpha-tocopheryl succinate)	 Vitamin E promotes cardiovascular health. Vitamin E protects the body against free radicals. Vitamin E protects cell membranes from free radicals. Vitamin E is a major lipid soluble antioxidant.
		Selenium (selenomethionine)	 Selenium is an essential trace mineral that supports the function of antioxidant enzymes. Selenium supports the antioxidant activity of vitamin E.
		Green tea (Cemilliasinensis)(leaves) standardized to 30%polyphenols	1) Polyphenol catechins are antioxidants that protect against free radicals.
		Co-enzyme Q10 (ubiquinone)	1) Co-enzyme ${\bf Q10}$ is an antioxidant that protects against free radicals.
		Alpha lipoic acid	1) Alpha lipoic acid is an antioxidant that protects against free radicals.
		Garlic (Allium sativum) (bulb)	1) Garlic is contains an antioxidant that protects against free radicals.
		Grape seed (Vitisvinifera)(seed) standardized to 8595% proanthocyanidins	1) Proanthocyanidins are antioxidants that protect against free radicals.